# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

The Grand Jury charges:

JUDGE OLIVER

## COUNT 1

(Conspiracy to Commit Smuggling Goods from the United States and Illegal Shipment of Firearms: 18 U.S.C. §§ 371, 554, 922(e))

#### THE VIOLATION

From on or about May 12, 2011, through on or about September 16, 2014, the exact dates to the Grand Jury unknown, in the Northern District of Ohio, Eastern Division and elsewhere, GEORGE NAKHLE AJALTOUNI (hereinafter, "AJALTOUNI") and JEAN YOUSSEF ISSA (hereinafter, "ISSA"), defendants herein, knowingly conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury, to commit acts in violation of Title 18, United States Code, Sections 554 and 922(e). Specifically, they agreed (a) to fraudulently and knowingly export and send from the United States, any merchandise, article, and object contrary to any law and regulation of the United States; and (b) to knowingly deliver

and cause to be delivered to any common and contract carrier for transportation and shipment in interstate and foreign commerce, to persons other than licensed importers, licensed manufacturers, licensed dealers, and licensed collectors, any package and other container in which there is any firearm and ammunition without written notice to the carrier that such firearm and ammunition is being transported and shipped.

# **OBJECT OF THE CONSPIRACY**

The object of the conspiracy was for defendants to make a profit by purchasing large quantities of firearms in the United States, and illegally shipping them to Beirut, Lebanon, where the firearms were re-sold.

## MANNER AND MEANS

It was part of the conspiracy that:

- A. AJALTOUNI purchased firearms from federal firearms dealers and from private sales from individual sellers who were not federal firearms dealers. AJALTOUNI also frequently attended gun shows throughout Northeast Ohio and paid cash to purchase multiple firearms from exhibitors.
  - B. AJALTOUNI acquired used automobiles from individuals.
- C. ISSA traveled from Beirut, Lebanon, to Cleveland, Ohio, to assist in preparing shipments of firearms from Cleveland to Beirut.
- D. AJALTOUNI and ISSA concealed firearms in hidden compartments in the automobiles.
- E. AJALTOUNI and ISSA shipped the automobiles containing the hidden firearms to Beirut, Lebanon.
  - F. AJALTOUNI and ISSA sold the firearms in Lebanon.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed in the Northern District of Ohio, Eastern Division, and elsewhere:

- 1. On or about May 2, 2011, AJALTOUNI shipped a black 2004 Infiniti FX 35 to Beirut, Lebanon.
- 2. On or about July 5, 2011, AJALTOUNI traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 3. On or about August 23, 2011, AJALTOUNI traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 4. On or about March 27, 2012, AJALTOUNI shipped a 2004 BMW X5 to Beirut, Lebanon.
- 5. On or about April 11, 2012, AJALTOUNI shipped a 2005 BMW M3 to Beirut, Lebanon.
- 6. On or about May 24, 2012, AJALTOUNI traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 7. On or about June 1, 2012, AJALTOUNI shipped a 2009 BMW 335i to Beirut, Lebanon.
- 8. On or about June 7, 2012, AJALTOUNI traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 9. On or about June 10, 2012, AJALTOUNI purchased three firearms from Goschinski Fin Feather Fur Outfitters, a federal firearms licensee.
- 10. On or about July 10, 2012, AJALTOUNI traveled from Cleveland, Ohio, to Beirut, Lebanon.

- 11. On or about August 3, 2012, AJALTOUNI traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 12. On or about August 19, 2012, AJALTOUNI purchased two firearms from Esquire Arms LLC, a federal firearms licensee.
- 13. On or about August 28, 2012, AJALTOUNI purchased a blue 2005 Honda Pilot from Manheim Auctions.
- 14. On or about October 7, 2012, AJALTOUNI purchased three firearms from Goschinski Fin Feather Fur Outfitters, a federal firearms licensee.
- 15. On or about October 22, 2012, AJALTOUNI shipped a blue 2005 Honda Pilot to Beirut, Lebanon.
- 16. On or about October 24, 2012, ISSA traveled from Beirut, Lebanon, to San Francisco, California.
- 17. On a date unknown to the Grand Jury between October 24, 2012, and December 3, 2012, ISSA traveled from San Francisco, California, to Cleveland, Ohio.
- 18. On or about November 13, 2012, AJALTOUNI purchased a red 2005 Honda Pilot from Manheim Auctions.
- 19. On or about November 20, 2012, AJALTOUNI purchased five firearms from Goschinski Fin Feather Fur Outfitters, a federal firearms licensee.
- 20. On or about November 25, 2012, AJALTOUNI purchased two firearms from The.22 Chamber, a federal firearms licensee.
- 21. On or about November 28, 2012, AJALTOUNI shipped a red 2005 Honda Pilot to Beirut, Lebanon.
- 22. On or about December 3, 2012, ISSA traveled from Cleveland, Ohio, to Beirut Lebanon.

- 23. On or about January 12, 2013, AJALTOUNI purchased two firearms from Goschinski Fin Feather Fur Outfitters, a federal firearms licensee.
- 24. On or about January 22, 2013, AJALTOUNI purchased a 2005 silver Honda Pilot from Manheim Auctions.
- 25. On or about January 27, 2013, AJALTOUNI attended a gun show in Niles, Ohio, and purchased seven firearms.
- 26. On or about February 3, 2013, AJALTOUNI attended a gun show in Akron, Ohio, and purchased twelve firearms.
- 27. On or about February 10, 2013, AJALTOUNI attended a gun show in East Canton, Ohio, and purchased eleven firearms.
- 28. On or about February 16, 2013, AJALTOUNI attended a gun show in Berea, Ohio, and purchased eleven firearms.
- 29. On or about February 17, 2013, AJALTOUNI attended a gun show in Medina, Ohio, and purchased seven firearms.
- 30. On or about February 26, 2013, AJALTOUNI purchased a 2005 gold Honda Pilot.
- 31. On or about March 5, 2013, AJALTOUNI shipped a 2005 gold Honda Pilot to Beirut, Lebanon, containing approximately 42 firearms.
- 32. On or about March 5, 2013, AJALTOUNI shipped a 2005 silver Honda Pilot to Beirut, Lebanon, containing approximately 41 firearms.
- 33. On or about March 5, 2013, AJALTOUNI traveled from Cleveland, Ohio, to Beirut Lebanon.
- 34. On or about April 4, 2013, AJALTOUNI traveled from Beirut, Lebanon, to Cleveland, Ohio.

- 35. On or about April 7, 2013, AJALTOUNI attended a gun show in Columbus, Ohio, and purchased fourteen firearms.
- 36. On or about April 9, 2013, AJALTOUNI purchased eight firearms from a location unknown to the Grand Jury.
- 37. On or about April 9, 2013, AJALTOUNI purchased three firearms from Goschinski Fin Feather Fur Outfitters, a federal firearms licensee.
- 38. On or about April 13, 2013, AJALTOUNI attended a gun show in Niles, Ohio, and purchased nineteen firearms.
- 39. On or about April 20, 2013, AJALTOUNI attended a gun show in Medina, Ohio, and purchased sixteen firearms.
- 40. On or about April 28, 2013, AJALTOUNI attended a gun show in Berea, Ohio, and purchased eleven firearms.
- 41. On or about May 18, 2013, AJALTOUNI attended a gun show in Niles, Ohio, and purchased seventeen firearms.
- 42. On or about May 20, 2013, AJALTOUNI purchased a gold 2005 Honda Pilot from Manheim Auctions.
- 43. On or about June 4, 2013, AJALTOUNI attended a gun show in Mansfield, Ohio, and purchased twenty firearms.
- 44. On or about June 22, 2013, AJALTOUNI attended a gun show in Medina, Ohio, and purchased thirteen firearms.
- 45. On or about June 14, 2013, AJALTOUNI shipped a gold 2005 Honda Pilot, in which approximately 43 firearms were concealed to Beirut Lebanon.
- 46. On or about June 17, 2013, AJALTOUNI purchased a green 2005 Honda Pilot from an auto auction in Pennsylvania.

- 47. On or about July 13, 2013, AJALTOUNI attended a gun show in Berea, Ohio, and purchased 23 firearms.
- 48. On or about July 17, 2013, AJALTOUNI shipped a green 2005 Honda Pilot, in which approximately 38 firearms were concealed, to Beirut Lebanon.
- 49. On or about July 17, 2013, AJALTOUNI purchased a green 2005 Honda Pilot from Manheim Auction.
- 50. On or about July 31, 2013, AJALTOUNI shipped a green 2005 Honda Pilot, containing firearms in an amount unknown to the Grand Jury, to Beirut Lebanon.
- 51. On or about August 12, 2013, AJALTOUNI traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 52. On or about October 30, 2013, AJALTOUNI traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 53. On or about November 7, 2013, ISSA traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 54. On or about December 10, 2013, ISSA traveled from San Francisco, California, to Beirut, Lebanon.
- 55. On or about January 24, 2014, AJALTOUNI purchased a Smith and Wesson model MP9C firearm from an individual for approximately \$400.
- 56. On or about March 8, 2014, AJALTOUNI purchased a Smith and Wesson pistol, model M&P Shield from an individual for approximately \$400.
- 57. On or about March 12, 2014, AJALTOUNI purchased a black 2006 Hummer H3 from Manheim Auctions.
- 58. On or about March 26, 2014, ISSA traveled from Beirut, Lebanon, to Cleveland, Ohio.

- 59. In or around April 2014, AJALTOUNI purchased a 2006 Ford Freestar from a private party.
- 60. On or about April 8, 2014, ISSA traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 61. On or about April 15, 2014, AJALTOUNI shipped a 2006 Ford Freestar to Beirut, Lebanon, containing firearms in an amount unknown to the Grand Jury.
- 62. On or about April 16, 2014, AJALTOUNI shipped a 2006 Hummer H3 to Beirut, Lebanon, containing firearms in an amount unknown to the Grand Jury.
- 63. On or about April 16, 2014, AJALTOUNI traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 64. On or about April 29, 2014, AJALTOUNI traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 65. On or about July 26, 2014, ISSA traveled from Beirut, Lebanon, to Cleveland, Ohio.
- 66. On a date between July 26, 2014, and August 10, 2014, AJALTOUNI purchased a green 2006 Honda Odyssey from a private party.
- 67. On a date between July 26, 2014, and August 10, 2014, ISSA attempted to remove interior panels from a 2006 Range Rover.
- 68. On or about August 4, 2014, AJALTOUNI purchased an HS Products (Springfield Armory) pistol, model XDS, 9mm caliber, serial #S4905787, from an individual for approximately \$500.
- 69. On a date between August 4, 2014, and August 10, 2014, ISSA wrapped a Springfield Armory (HS Products) pistol, model XDS, 9mm caliber, serial #S4905787, in packing material.

- 70. On or about August 10, 2014, ISSA traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 71. On or about August 11, 2014, AJALTOUNI traveled from Cleveland, Ohio, to Beirut, Lebanon.
- 72. On a date between August 4, 2014, and August 11, 2014, AJALTOUNI shipped a 2006 Range Rover to Beirut, Lebanon, containing one firearm.
- 73. On a date between August 4, 2014, and August 11, 2014, AJALTOUNI shipped a green 2006 Honda Odyssey to Beirut, Lebanon, containing the following 93 firearms:

		•	
Make	Model	Caliber	Serial Number
Glock	19	9mm	VFL257
Beretta	PX4	9mm	PX5212R
Springfield	XDM-45ACP	.45	MG532712
Glock	19	9mm	GKU507
Beretta	PX4 Storm	9mm	PX61810
Beretta	PX4 Storm	.40	PZ9017A
Beretta	PX4 Storm	9mm	PX7987H
Beretta	PX4 Storm	.40	PZ72750
Beretta	PX4 Storm	9mm	PX0029T
Beretta	92FS	9mm	J33724Z
S&W	MP9 Shield	9mm	HPV9431
Beretta	PX4-Storm	9mm	PX153550
Glock	19	9mm	SWC418
S&W	M&P	9mm	HRV3380
Springfield	XDM	9mm	MG880191
Glock	19	9mm	AAAU590
Beretta	92FS	9mm	BER431793Z
Beretta	PX4 Storm	9mm	PX6364M
Glock	26	9mm	VWK647
Beretta	96	.40	BER071138
Beretta	92FS	9mm	BER277419
Glock	19	9mm	FFT516
Springfield	XP5	.45	XS541246
Springfield	XP5	9mm	S3921896
Springfield	XPM	9mm	MG845595
Beretta	92A1	9mm	J97642Z
Beretta	PX4 Storm	9mm	PX6644N
Glock	17	9mm	RVE939
Beretta	M9	9mm	M9-137040

Make	Model	Caliber	Serial Number
Beretta	96	.40	BER350689
S&W	M&P9	9mm	MEP3691
Glock	17	9mm	UEE136
Beretta	92A1	9mm	J83076Z
Sig Sauer	SP2022	9mm	24B107854
Glock	19	9mm	WT431 US
Glock	17	9mm	VED502
Glock	19	9mm	WCP918
Glock	17	9mm	TDW457
Beretta	92A1	9mm	K67388Z
Glock	19	9mm	WNE617
Walther	PPX	9mm	FAP4404
Springfield	XDM40-40	.40	MG141078
Springfield	XDM-9	9mm	MG936147
FN	FNX-9	9mm	FX1U024924
S&W	M&P9	9mm	HRD4699
Springfield	XD-40	.40	MG132466
Beretta	92FS	9mm	BER232988
S&W	M&P9	9mm	HAE5380
S&W	M&P9C	9mm	HAT3611
Glock	17	9mm	UVB532
Beretta	96D Centurion	.40	BER026947M
Beretta	92FS	9mm	BER197165
Beretta	PX4 Storm	9mm	PX4614S
Springfield	XDM40	.40	MG242885
Beretta	96 Brigadier D	.40	BER067821
S&W	M&P40	.40	DXC1536
Beretta	92FS	9mm	BER112648Z
S&W	MP9 Shield	9mm	HSK1362
Springfield	XDM-9	9mm	MG950947
Beretta	PX4 Storm	9mm	PZ76946
Glock	17	9mm	AHM234
Beretta	PX4 Storm	9mm	PX146867
Beretta	96	.40	BER061131M
S&W	M&DO	2-Omm	DXW3285
Beretta	M9 American's	9mm	M9-05-0290
Beretta	defender	711111	1415 05 0250
Beretta	PX4 Storm	.40	PY72719
Beretta	92F	9mm	BER053372Z
Beretta	PX4 Storm	9mm	PX104688
Springfield	PDM-9	9mm	MG904756.
Springfield	XDM	.40	MG175592
S&W	M&P9	9mm	DXZ9760
S&W	M&P9	9mm	DSL7822
Beretta	92 SB compact	9mm	E16609Z
Ducha	12 of compact	/111111	[100072

Make	Model	Caliber	Serial Number
Beretta	92 FS	9mm	BER656096
Beretta	PX4 Storm	.40	PY03973
S&W	M&P9	9mm	DVD0548
Beretta	PX4 Storm	.40	PY73337
Beretta	PX4 Storm	9mm	PX196339
S&W	SD9	9mm	DUT4204
S&W	MP9 Shield	9mm	HSH9214
Springfield	XDM40	.40	MG209825
Beretta	92FS	9mm	E28187Z
S&W	MP9	9mm	MPJ8259
Glock	19	9mm	SNZ511
Glock	17 America's	9mm	USA0863
	Heroes		
Beretta	92FS	9mm	L10670Z
Sig Sauer	SP2022	9mm	24B096447
Springfield	XDM	.40	MG240160
Beretta	PX4 Storm	.40	PY101153
Glock	17	9mm	1EUU058US
Surplus	LOW15	223	SA08982
Ammo &			
Arms			
Zastava (VZ)	PAP M92PV	7.62 mm	M92PV035463
Zastava (VZ)	PAP M92PV	7.62 mm	M92PV035609

All in violation of Title 18, United States Code, Section 371.

The Grand Jury further charges:

# COUNT 2

(Smuggling Goods from the United States: 18 U.S.C. §§ 554 and 2)

On a date between August 4, 2014, and August 11, 2014, in the Northern District of Ohio, Eastern Division, GEORGE NAKHLE AJALTOUNI and JEAN YOUSSEF ISSA, defendants herein, fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States, a Springfield Armory (HS Products) pistol, model XDS, 9mm caliber, serial #S4905787, contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et

seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

The Grand Jury further charges:

## COUNT 3

(Smuggling Goods from the United States: 18 U.S.C. §§ 554 and 2)

On a date between August 4, 2014, and August 11, 2014, in the Northern District of Ohio, Eastern Division, GEORGE NAKHLE AJALTOUNI, and JEAN YOUSSEF ISSA, defendants herein, fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States 93 firearms described in Overt Act 73 of paragraph 1 of this Indictment, incorporated herein by reference as if fully set forth herein, contrary to the Arms Export Control Act, 22 U.S.C. §§ 2778(b)(2) and 2778(c), and International Traffic in Arms Regulations (22 C.F.R. Part 120 et seq.), laws and regulations of the United States, all in violation of Title 18, United States Code, Sections 554 and 2.

The Grand Jury further charges:

## COUNT 4

(Unlawful Delivery of Firearms to Common Carrier: 18 U.S.C. §§ 922(e), 924(a)(1)(D), and 2)

On a date between August 4, 2014, and August 11, 2014, in the Northern District of

Ohio, Eastern Division, GEORGE NAKHLE AJALTOUNI and JEAN YOUSSEF ISSA,

defendants herein, knowingly and willfully delivered and caused to be delivered to

Mediterranean Shipping Corporation, a common and contract carrier for transportation and
shipment in interstate and foreign commerce, to persons other than licensed importers, licensed
manufacturers, licensed dealers, and licensed collectors, a 2006 Range Rover, VIN

#SALSH23456A952791 in which there was a firearm, to wit, a Springfield Armory (HS

Products) pistol, model XDS, 9mm caliber, serial #S4905787, without written notice to the carrier that such firearm was being transported and shipped, all in violation of Title 18, United States Code, Sections 922(e) and 924(a)(1)(D).

The Grand Jury further charges:

### COUNT 5

(Unlawful Delivery of Firearms to Common Carrier: 18 U.S.C. §§ 922(e), 924(a)(1)(D), and 2)

On a date between August 4, 2014, and August 11, 2014, in the Northern District of Ohio, Eastern Division, GEORGE NAKHLE AJALTOUNI and JEAN YOUSSEF ISSA, defendants herein, knowingly and willfully delivered and caused to be delivered to Maersk Line, a common and contract carrier for transportation and shipment in interstate and foreign commerce, to persons other than licensed importers, licensed manufacturers, licensed dealers, and licensed collectors, a green 2006 Honda Odyssey containing the 93 firearms described in Overt Act 73 of paragraph 1 of this Indictment, incorporated herein by reference as if fully set forth herein, without written notice to the carrier that such firearms were being transported and shipped, all in violation of Title 18, United States Code, Sections 922(e), 924(a)(1)(D), and 2.

The Grand Jury further charges:

## COUNT 6

(Control of arms exports and imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 2)

On a date between August 4, 2014, and August 11, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, GEORGE NAKHLE AJALTOUNI and JEAN YOUSSEF ISSA, defendants herein, knowingly and willfully exported and caused to exported from the United States to Lebanon, defense articles, to wit, a Springfield Armory (HS Products) pistol, model XDS, 9mm caliber, serial #S4905787, that was designated as a defense article on

the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

The Grand Jury further charges:

# COUNT 7

(Control of arms exports and imports, 22 U.S.C. §§ 2778(b)(2), 2778(c), and 2)

On a date between August 4, 2014, and August 11, 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, GEORGE NAKHLE AJALTOUNI and JEAN YOUSSEF ISSA, defendants herein, knowingly and willfully exported and caused to be exported from the United States to Lebanon, defense articles, to wit, the 93 firearms described in Overt Act 73 of paragraph 1 of this Indictment, incorporated herein by reference as if fully set forth herein, that were designated as defense articles on the United States Munitions List, without having first obtained from the Department of State a license for such export and written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2), 2778(c), and 2, and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, and 127.1.

The Grand Jury further charges:

### COUNT 8

(Unlicensed Dealing in Firearms: 18 U.S.C. §§ 922(a)(1)(A), 923(a), and 924(a)(1)(D))

From on or about May 12, 2011, through on or about September 16, 2014, in the Northern District of Ohio, Eastern Division, the defendant, GEORGE NAKHLE AJALTOUNI, not being a licensed importer, licensed manufacturer, or licensed dealer, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

The Grand Jury further charges:

#### FORFEITURE

For the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1), 18 U.S.C. § 981(a)(1)(C), 22 U.S.C. § 401, and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 8 are incorporated herein by reference. As a result of the foregoing offenses, defendants GEORGE NAKHLE AJALTOUNI and JEAN YOUSSEF ISSA shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all arms or munitions of war and/or any vehicle containing such arms or munitions being used in exporting or attempting to export such arms or munitions; and any and all property (including firearms and ammunition) involved in or used in the commission of such violations; including, but not limited to, the following firearms:

Make	Model	Caliber	Serial Number
Springfield	XDS	9mm	S4905787
Armory (HS		•	
Products)			
Glock	19	9mm	VFL257
Beretta	PX4	9mm	PX5212R
Springfield	XDM-45ACP	.45	MG532712
Glock	19	9mm	GKU507

Make	Model	Caliber	Serial Number
Beretta	PX4 Storm	9mm	PX61810
Beretta	PX4 Storm	.40	PZ9017A
Beretta	PX4 Storm	9mm	PX7987H
Beretta	PX4 Storm	.40	PZ72750
Beretta	PX4 Storm	9mm	PX0029T
Beretta	92FS	9mm	J33724Z
S&W	MP9 Shield	9mm	HPV9431
Beretta	PX4-Storm	9mm	PX153550
Glock	19	9mm	SWC418
S&W	M&P	9mm	HRV3380
Springfield	XDM	9mm	MG880191
Glock	19	9mm	AAAU590
Beretta	92FS	9mm	BER431793Z
Beretta	PX4 Storm	9mm	PX6364M
Glock	26	9mm	VWK647
Beretta	96	.40	BER071138
Beretta	92FS	9mm	BER277419
Glock	19	9mm	FFT516
Springfield	XP5	.45	XS541246
Springfield	XP5	9mm	S3921896
Springfield	XPM	9mm	MG845595
Beretta	92A1	9mm	J97642Z
Beretta	PX4 Storm	9mm	PX6644N
Glock	17	9mm	RVE939
Beretta	M9	9mm	M9-137040
Beretta	96	.40	BER350689
S&W	M&P9	9mm	MEP3691
Glock	17	9mm	UEE136
Beretta	92A1	9mm	J83076Z
Sig Sauer	SP2022	9mm	24B107854
Glock	19	9mm	WT431 US
Glock	17	9mm	VED502
Glock	19	9mm	WCP918
Glock	17	9mm	TDW457
Beretta	92A1	9mm	K67388Z
Glock	19	9mm	WNE617
Walther	PPX	9mm	FAP4404
Springfield	XDM40-40	.40	MG141078
Springfield	XDM-9	9mm	MG936147
FN	FNX-9	9mm	FX1U024924
S&W	M&P9	9mm	HRD4699
Springfield	XD-40	.40	MG132466
Beretta	92FS	9mm	BER232988
S&W	M&P9	9mm	HAE5380

Make	Model	Caliber	Serial Number
S&W	M&P9C	9mm	HAT3611
Glock	17	9mm	UVB532
Beretta	96D Centurion	.40	BER026947M
Beretta	92FS	9mm	BER197165
Beretta	PX4 Storm	9mm	PX4614S
Springfield	XDM40	.40	MG242885
Beretta	96 Brigadier D	.40	BER067821
S&W	M&P40	.40	DXC1536
Beretta	92FS	9mm	BER112648Z
S&W	MP9 Shield	9mm	HSK1362
Springfield	XDM-9	9mm	MG950947
Beretta	PX4 Storm	9mm	PZ76946
Glock	17	9mm	AHM234
Beretta	PX4 Storm	9mm	PX146867
Beretta	96	.40	BER061131M
S&W	M&P9	9mm	DXW3285
Beretta	M9 American's	9mm	M9-05-0290
Beretta	defender		1713 00 0250
Beretta	PX4 Storm	.40	PY72719
Beretta	92F	9mm	BER053372Z
Beretta	PX4 Storm	9mm	PX104688
Springfield	PDM-9	9mm	MG904756.
Springfield	XDM	.40	MG175592
S&W	M&P9	9mm	DXZ9760
S&W	M&P9	9mm	DSL7822
Beretta	92 SB compact	9mm	E16609Z
Beretta	92 FS	9mm	BER656096
Beretta	PX4 Storm	.40	PY03973
S&W	M&P9	9mm	DVD0548
Beretta	PX4 Storm	.40	PY73337
Beretta	PX4 Storm	9mm	PX196339
S&W	SD9	9mm	DUT4204
S&W	MP9 Shield	9mm	HSH9214
Springfield	XDM40	.40	MG209825
Beretta,	92FS	9mm	E28187Z
S&W	MP9	9mm	MPJ8259
Glock	19	9mm	SNZ511
Glock	17 America's	9mm	USA0863
	Heroes	·	
Beretta	92FS	9mm	L10670Z
Sig Sauer	SP2022	9mm	24B096447
Springfield	XDM	.40	MG240160
Beretta	PX4 Storm	.40	PY101153
Glock	17	9mm	1EUU058US
Surplus	LOW15	223	SA08982

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Make	Model	Caliber	Serial Number
Ammo &			
Arms			
Zastava (VZ)	PAP M92PV	7.62 mm	M92PV035463
Zastava (VZ)	PAP M92PV	7.62 mm	M92PV035609

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government  $Act\ of\ 2002.$